Remarks

Claims 1-19 are pending. Claims 1-2 are currently amended. Claims 3-19 are new. A clean copy of the pending claims is attached to this response for the convenience of the Examiner.

A.   Objections to the Drawings

The drawings have been objected to under 37 CFR 1.83(a) for failing to show every feature of the invention specified in the claims. Applicant contends that the drawings do show every feature of the invention specified in the claims. Accordingly, Applicant has amended paragraphs of the specification where element numbers do not appear in the Figures to which they are referenced. In particular, the item 142 in the specification referring to Figure 3 has been corrected to refer to item 342 in the Figure. The items described in the specification as MC (110) and MPMM (430) in Figure 5 have been amended to refer to these items shown in Figures 3 and 4.

In short, Applicant contends that the amendments to the specification address the Examiner's concerns, and that new drawings are thus no longer warranted. These amendments to the specification do not add new matter. Therefore, Applicant respectfully requests that the objection to the drawings be withdrawn.

B.   Claim Rejections - 35 USC § 112

Claim 2 has been rejected under 35 U.S.C. § 112, 2nd paragraph, for reciting the limitation "said endpoint" without sufficient antecedent basis. Applicant has amended claim 2 and removed "said endpoint" from the claim. Therefore, Applicant believes the rejection of claim 2 is now moot and respectfully requests that the rejection of claim 2 under 35 U.S.C. § 112 be withdrawn.

C.   Claim Rejections - 35 USC § 103(a)

Applicant respectfully traverses the Examiner's conclusion that Krishnaswamy (US 5,867,494) in view of Shaffer et al. (US 6,738,343) renders claims 1-2 obvious under 35 U.S.C. § 103(a) in so far as (1) there is no motivation to combine Krishnaswamy with Shaffer and (2) even if combined, the combination of Krishnaswamy and Shaffer does not disclose all of the limitations of claims 1-2.

(1) There is no motivation to combine the teachings of Krishnaswamy with Shaffer because their teachings are incompatible and would not give an expectation of success. The system disclosed in Krishnaswamy is heterogeneous. Namely, the system in Krishnaswamy is directed to capturing events for billing of a videoconference call. Krishnaswamy discloses an H.323 video conferencing system in Fig. 19C having an H.323 MCU and terminals supporting H.323, H.320, and H.324. The MCU "uses ITU H.245 messages and methods to implement the features and functions of the multipoint controller and multipoint processor." (Krishnaswamy at col. 131, ll. 34-36). Krishnaswamy also discloses a Video Store and Forward architecture in Fig. 19D that receives analog video from different sources and H.320 video from the MCU as input. The input is transcoded into H.324, H.261, H.263 or MPEG multimedia information. (See Krishnaswamy at Fig. 19D and col. 136, ll. 46-54).

In contrast, the system disclosed in Schaffer is homogeneous. Namely, the system in Schaffer is directed to a back up system for a telecommunications system having primary and secondary control units to handle signaling communication in case of failures. In Fig. 1, the system is an H.323 telecommunication system having all H.323 terminals, an MCU, and H.323 gatekeepers. (See Schaffer at Fig. 1 and col. 3, ll. 18-25). Schaffer discloses that, although Fig. 1 describes an H.323 network, the backup system is also applicable to a Megaco network. (See Schaffer at col. 3, ll. 6-12). The Office Action states that Shaffer "presents a solution for multimedia systems using Media Control Units (MCU) to enable the communications between terminals supporting different media protocols." Applicant respectfully disagrees. Shaffer presents a backup system using an MCU in communication with terminals supporting all the same media protocol as the MCU, whether it is H.323 or Megaco.

A heterogeneous system having terminals, MCU, gatekeepers, etc. supporting different protocols (as in Krishnaswamy) is not compatible with a homogenous system supporting all the same protocol (as is Shaffer). Therefore, there is not motivation to combine the teachings of Krishnaswamy and Shaffer because combining incompatible systems would not give an expectation of success. For at least this reason, Krishnaswamy in view of Shaffer cannot render claims 1-2 obvious, and Applicant respectfully requests allowance of claims 1-2 in the next paper from the Office.

(2) Even if it were appropriate to combine Krishnaswamy with Shaffer, which Applicant does not concede, the combination of Krishnaswamy with Shaffer still fails to disclose all of the limitations of claims 1-2.

Claim 1 requires:

1. A system for controlling multimedia multipoint communication, comprising:
    a plurality of multimedia terminals supporting different multimedia conferencing protocols;
    a multipoint controller in communication with said plurality of multimedia terminals for call signaling and call control information; and
    at least one multipoint processor unit in communication with said plurality of multimedia terminals for media information and in communication with said multipoint controller over H.248/Megaco protocol for interfacing the call signaling and the call control information between said multipoint controller and the terminals, wherein the multipoint controller is used to establish and control multipoint mixing of media.

At most, Krishnaswamy discloses an H.323 MCU and terminals supporting different protocols. The MCU "uses ITU H.245 messages and methods to implement the features and functions of the multipoint controller and multipoint processor." (Krishnaswamy at col. 131, ll. 34-36). As noted in the Office Action, Krishnaswamy fails to disclose any teaching of using H.248/Megaco protocol to communicate between a multipoint processor and a multipoint controller to establish and control multipoint mixing of media on the multipoint processors (see Applicant's Figues 5, 6, and pages 10 to 16 in the specification). Shaffer only discloses the possibility of having a homogenous backup system using a Megaco network with an MCU and terminals all based on the same protocol. Therefore, the combination of Krishnaswamy and Shaffer does not disclose at least one multipoint processor unit in communication with a control

unit over H.248/Megaco protocol, where the processor unit handles media information and is in communication with multimedia terminals supporting different protocols for interfacing the call signaling and call control information between the control unit and the terminals of different protocols.

For at least these reasons, Applicants believe that Krishnaswamy in view of Shaffer cannot render claims 1-2 obvious, and Applicant respectfully requests allowance of claims 1-2 in the next paper from the Office.

D. New Claims 3 through 19

New claims 3-19 have been added and are fully supported by the originally filed disclosure and do not add new matter. New claims 3-19 are at least supported by original claims 1 and 2, Figs. 3-5, and pages 7 to 14 of the original disclosure.

Applicants believe that new claims 3-19 are neither anticipated by nor rendered obvious over the art of record for at least the same reasons presented above, and Applicant respectfully requests allowance of these claims in the next paper from the Office.

E. Conclusion

This amendment adds 2 independent claims and 15 dependent claims to make a total of 3 independent claims and 19 dependent claims, for which the filing fee has already been paid. Therefore, no fees are believed due at this time. The undersigned representative requests any extension of time that may be deemed necessary to further the prosecution of this application. Should any fees be due for any reason, the undersigned representative authorizes the Commissioner to charge any additional fees that may be required, or credit any overpayment, to Deposit Account No. 501922/199-0121US.

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Appl. No.: 09/852,438
Amdt. dated Jan. 17, 2005
Reply to Office Action of Sept. 17, 2004

To facilitate the resolution of any issues or questions presented by this paper, Applicant respectfully requests that the Examiner directly contact the undersigned by phone to further the discussion, reconsideration, and allowance of the claims.

Respectfully submitted,

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Convenience Clean Copy of Pending Claims

1.   (Currently Amended) A system for controlling multimedia multipoint communication, comprising:

> a plurality of multimedia terminals supporting different multimedia conferencing protocols;
>
> a multipoint controller in communication with said plurality of multimedia terminals for call signaling and call control information; and
>
> at least one multipoint processor unit in communication with said plurality of multimedia terminals for media information and in communication with said multipoint controller over H.248/Megaco protocol for interfacing the call signaling and the call control information between said multipoint controller and the terminals, wherein the multipoint controller is used to establish and control multipoint mixing of media.

2.   (Currently Amended) The system of claim 1, wherein the multipoint processor unit is in communication with at least one non-H.323 terminal that is not supporting H.323 protocol, and wherein the multipoint processor unit is capable of:

> demultiplexing input from said non-H.323 terminal into call signaling and call control information and into media information; and
>
> transferring the call signaling and the call control information to the multipoint controller over H.248/Megaco.

3.   (New) The system of claim 2, wherein the multipoint processor unit is capable of:
> receiving the call signaling and call control information from the multipoint controller directed to the non-H.323 terminal;
> multiplexing the call signaling and call control information; and
> transferring the multiplexed information to the non-H.323 terminal.

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4.   (New) The system of claim 1, wherein the at least one multipoint processor unit is in communication with the plurality of multimedia terminals for call signaling and call control information.

5.   (New) The system of claim 1, wherein the multipoint controller includes an H.248 module for receiving and transmitting information from and to the multipoint processor unit.

6.   (New) The system of claim 5, wherein the multipoint controller includes a management module for managing information between the H.248 module and at least one of an H.323 stack, an SIP stack, an SS7 module, or a conference management module.

7.   (New) The system of claim 1, wherein the multipoint processor unit includes an H.248 module for receiving and transmitting information from and to the multipoint controller.

8.   (New) The system of claim 7, wherein the multipoint processor unit includes a management module for managing information between the H.248 module and at least one of a switch packet network interface, a switched circuit network interface, an active context, or a bank of available terminations.

9.   (New) A system for controlling multimedia multipoint communication between a plurality of multimedia terminals supporting different multimedia conferencing protocols, at least one of the terminals being a non-H.323 terminal not supporting H.323 protocol, the communication including call signaling, call control, and media information, the system comprising:

        a multipoint controller handling the call signaling and call control information for the terminals; and

        a multipoint processor handling the media information for the terminals, the processor in communication with the controller over H.248/Megaco protocol and in

communication with the non-H.323 terminal, the processor interfacing the call signaling and call control information between the controller and the non-H.323 terminal to establish and control multipoint mixing of media.

10.   (New) The system of claim 9, wherein the processor receives input from the non-H.323 terminal, demultiplexes the input into call signaling, call control, and media information, and transfers the call signaling and call control information to the controller over H.248/Megaco protocol.

11.   (New) The system of claim 9, wherein the processor receives call signaling and call control information from the controller directed to the non-H.323 terminal, multiplexes the received information, and transfers the multiplexed information to the non-H.323 terminal.

12.   (New) The system of claim 9, wherein the processor is in communication with the plurality of multimedia terminals for handling the call signaling and call control information.

13.   (New) The system of claim 9, wherein the multipoint controller includes an H.248 module for receiving and transmitting information from and to the multipoint processor.

14.   (New) The system of claim 13, wherein the multipoint controller includes a management module for managing information between the H.248 module and at least one of an H.323 stack, an SIP stack, an SS7 module, or a conference management module.

15.   (New) The system of claim 9, wherein the multipoint processor includes an H.248 module for receiving and transmitting information from and to the multipoint controller.

16.   (New) The system of claim 9, wherein the multipoint processor includes a management module for managing information between the H.248 module and at least one of a switch packet

network interface, a switched circuit network interface, an active context, or a bank of available terminations.

17.   (New) A method of controlling multimedia multipoint communication between a plurality of multimedia terminals supporting different multimedia conferencing protocols, at least one of the terminals being a non-H.323 terminal not supporting H.323 protocol, the communication including call signaling, call control, and media information, the method comprising:

> handling the call signaling and call control information for the terminals with a multipoint controller;
>
> handling the media information for the terminals with a multipoint processor;
>
> communicating information between the processor and the controller over H.248/Megaco protocol; and
>
> interfacing the call signaling and call control information between the controller and the non-H.323 terminal with the processor to establish and control multipoint mixing of media.

18.   (New) The method of claim 17, wherein interfacing the call signaling and call control information between the controller and the non-H.323 terminal with the processor comprises:

> receiving input from the non-H.323 terminal;
>
> demultiplexing the input into call signaling, call control, and media information; and
>
> transferring the call signaling and call control information to the multipoint controller over H.248/Megaco protocol.

19.   (New) The method of claim 17, wherein interfacing the signaling and call control information between the controller and the non-H.323 terminal with the processor comprises:

> receiving call signaling and call control information from the multipoint controller directed to the non-H.323 terminal;

multiplexing the received information; and

transferring the multiplexed information to the non-H.323 terminal.